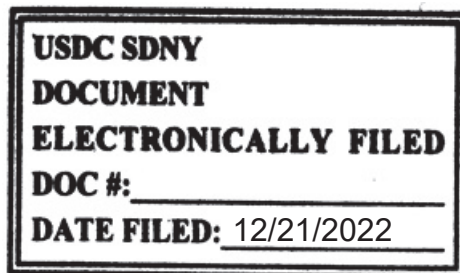


akerman



Jeffrey A. Kimmel

Akerman LLP
1251 Avenue of the Americas, 37th
Floor | New York, NY 10020
D: 212-259-6435 | C: 917-837-0121

December 21, 2022

VIA ECF

The Honorable Magistrate Judge Robert W. Lehrburger
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Rodriguez et al v. 673 J.R.V. Corp. et al*
Case No. 1:22-cv-05749 (LGS) (RWL)

Dear Judge Lehrburger:

We represent Defendants 673 J.R.V. Corp., John LaCourte, and Lucilene Martins (collectively “Defendants”) in the above-captioned matter. We respectfully write on behalf of both parties to request a sixty (60) day extension of the current January 5, 2023 fact discovery deadline in this case, up to and until March 6, 2023. Consistent with this extension request, the parties also request that the Court extend the parties’ deadline to file a settlement status letter from January 19, 2023 up to and until March 20, 2023 and the pre-motion conference from January 25, 2023 up to and until March 27, 2023.

This request is made because the parties have agreed to mediate the case prior to the completion of discovery to potentially settle this case and save the parties the expense of completing discovery. This is the first request for extension of the fact discovery deadline in this matter.

Thank you for your consideration.

Respectfully Submitted,

/s/ Jeffrey A. Kimmel
Jeffrey A. Kimmel
Partner
For the Firm

cc: Plaintiffs’ attorney (via ECF)

Granted.
SO ORDERED:

12/21/2022 